

KAZEROUNI LAW GROUP, APC
Abbas Kazerounian, Esq. (SBN: 249203)
ak@kazlg.com
David J. McGlothlin, Esq. (SBN: 253265)
david@kazlg.com
Mona Amini, Esq. (SBN: 296829)
mona@kazlg.com
Gustavo Ponce, Esq. (SBN : 343430)
gustavo@kazlg.com
245 Fischer Avenue, Unit D1
Costa Mesa, California 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

Attorneys for Plaintiff,
Thomas Matthews

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

THOMAS MATTHEWS, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

XYZIES, LLC d/b/a XYZIES,

Defendant.

Case No.: 8:24-cv-00334-JWH-ADS

**STIPULATION TO DISMISS
ACTION PURSUANT TO F.R.C.P.
41(a) WITH PREJUDICE AS TO
PLAINTIFF'S INDIVIDUAL
CLAIMS AND WITHOUT
PREJUDICE AS TO THE
PUTATIVE CLASS**

//
//
//
//
//
//
//
//

1 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties,
2 Plaintiff Thomas Matthews (“Plaintiff”) and Defendant XYZIES, LLC d/b/a XYZIES
3 (“Defendant”) (jointly, the “Parties”), that the above-captioned action is dismissed,
4 pursuant to the Federal Rules of Civil Procedure 41(a)(1)(A)(ii), with prejudice as to
5 Plaintiff’s individual claims and without prejudice as to the claims of the putative
6 class against Defendant, with each party bearing its own costs, expenses, and
7 attorney’s fees.

8
9 Dated: October 7, 2024

Respectfully submitted,

10 **KAZEROUNI LAW GROUP, APC**

11
12 By: /s/ Mona Amini

13 Abbas Kazerounian, Esq.
14 David J. McGlothlin, Esq.
15 Mona Amini, Esq.
16 Gustavo Ponce, Esq.
17 245 Fischer Avenue, Unit D1
18 Costa Mesa, California 92626
19 Telephone: (800) 400-6808
20 Facsimile: (800) 520-5523
21 *Attorneys for Plaintiff*

22
23 Dated: October 7, 2024

24 **SAMO LAW GROUP**

25
26 By: /s/ Joseph Samo

27 Joseph Z. Samo, Esq.
28 170 Eucalyptus Avenue
San Diego, CA 92084
Phone: (619) 672-1741
Email: joe@samolaw.com
Attorney for Defendant

SIGNATURE CERTIFICATION

I, Mona Amini hereby certify that the content of this document is acceptable to all counsels listed above, and that I have obtained their authorizations to affix their electronic signatures to this document.

By: /s/ Mona Amini
Mona Amini, Esq.
Attorney for Plaintiff



CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2024, a copy of the foregoing document was served by ECF to counsel of record.

By: /s/ Mona Amini
Mona Amini, Esq.
Attorney for Plaintiff

